

**Hearing Date and Time: November 6, 2009 at 9:45 a.m. (EST)**  
**Objection Deadline: November 3, 2009 at 4:00 p.m. (EST)**

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*Attorneys for Bonnie J. Reynolds and Garland Reynolds, Jr.*

**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

-----X  
In re : Chapter 11  
: :  
Motors Liquidation Company, et al., : Case No. 09-50026 (REG)  
: :  
Debtors. : (Jointly Administered)  
: :  
-----X

**NOTICE OF MOTION FOR RELIEF FROM THE  
AUTOMATIC STAY PURSUANT TO 11 U.S.C. §362**

**PLEASE TAKE NOTICE** that on October 9, 2009, the undersigned filed and served the Motion for Relief from the Automatic Stay Pursuant to 11 U.S.C. §362 (the “Motion”) [Docket No. 4215], in the above-captioned proceeding.

**PLEASE TAKE FURTHER NOTICE** that a hearing (the “Hearing”) will be held in connection with the relief requested in the Motion and any further relief before the Honorable Robert E. Gerber at the United States Bankruptcy Court for the Southern District of New York

(the “Court”), Courtroom 621, One Bowling Green, New York, NY 10004-1408 on **November 6, 2009 at 9:45 a.m.**

**PLEASE TAKE FURTHER NOTICE** that objections or responses, if any, to the Motion shall be in writing, shall state with particularity the reasons for the objection or response and shall be (a) filed with the Court, with a copy delivered to the chambers of the Honorable Robert E. Gerber, and (b) served upon: (i) counsel for Movants, Joshua I. Divack, Esq., Hahn & Hessen LLP, 488 Madison Avenue, New York, NY 10022, and James C. Morton, Esq., Suite 1350, Two Midtown Plaza, 1349 West Peachtree Street, Atlanta, GA 30309; and (ii) the Master Service List listed in the Order to 11 U.S.C. § 105(a) and Fed. R. Bankr. P. 1015(c) and 9007 Establishing Notice and Case Management Procedures [Docket No. 3629] so as to ensure ***actual receipt*** by no later than **November 3, 2009 at 4:00 p.m.** Only those objections or responses which have been timely filed and served may be considered by the Court at the Hearing.

**PLEASE TAKE FURTHER NOTICE** that failure to respond in accordance with this notice may result in the Court granting the relief requested by the Motion without further notice or hearing.

Dated: New York, New York  
October 9, 2009

**HAHN & HESSEN LLP**

By: /s/ Joshua I. Divack  
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- and -

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